

SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DAVID NGUYEN (1), and
KAVIN PATEL (2),**

Defendants.

SA 16CR 879 FB
[Vio: Possession with Intent to Distribute
Cocaine, 21 U.S.C. §§ 841(a)(1) &
841(b)(1)(C); 18 U.S.C. § 2]

THE GRAND JURY CHARGES:

COUNT ONE

[21 USC §§ 841(a)(1) & 841(b)(1)(C) and 18 USC § 2]

That on or about November 10, 2016, in the Western District of Texas, Defendants,

**DAVID NGUYEN (1), and
KAVIN PATEL (2),**

aided and abetted by each other, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL,


FOREPERSON

RICHARD L. DURBIN, Jr.

United States Attorney



KAREN NORRIS

Assistant United States Attorney